
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 17-38012
)	
Eric B Nyszcot,)	Chapter 13
)	
Debtor(s).)	Judge Pamela S. Hollis

NOTICE OF MOTION

To: Glenn B Stearns, Chapter 13 Trustee *notice via ECF delivery system*
Eric B Nyszcot, 416 N Merrill St Park Ridge, IL 60068 *via US Mail*
Specialized Loan Servicing LLC, 8742 Lucent Blvd, Ste 300, Highlands Ranch, CO
80129, *via US Mail*
Additional Creditors, see attached service list

PLEASE TAKE NOTICE that on April 20, 2018 at 10:45 a.m., or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Pamela S. Hollis or any other Bankruptcy Judge presiding at Joliet City Hall 150 West Jefferson Street 2nd Floor Joliet, Illinois 60432, and present the attached MOTION TO AUTHORIZE LOAN MODIFICATION, and shall request that the attached Order be entered, at which time you may appear if so desired.

/s/ David H. Cutler
David H. Cutler, ESQ
Attorney for Debtor(s)
Cutler & Associates Ltd.
4131 Main St.
Skokie IL 60076
(847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed AND sent electronically and via US MAIL to the above captioned by 6:00 p.m. on or before April 5, 2018.

/s/ David H. Cutler
David H. Cutler, ESQ

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MOTION TO AUTHORIZE LOAN MODIFICATION

NOW COMES the Debtor, Eric B Nyszcot (hereinafter referred to as “DEBTOR”), by and through his attorneys, Cutler and Associates, Ltd., and moves this Honorable Court for entry of an Order Authorizing the LOAN MODIFICATION, and in support thereof, respectfully represent as follows:

1. On December 25, 2017 Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor’s Chapter 13 Plan was confirmed on March 2, 2018
3. The confirmed Plan is a 100% plan, and the plan payments are \$1112.00 for 2 months, and \$1175.00 for 58 months.
4. Debtor would like to accept an offer to modify his mortgage loan securing his real property located at 2812 Rutland Circle Naperville, IL 60564. (See Exhibit A).
5. At the time of filing of this case, the loan balance on this mortgage obligation was in the amount of \$169,000.00.
6. The new proposed principal balance of the Debtor’ loan will be \$158,162.00
7. The prior monthly payment was \$1,460.00 which included monthly principal and interest.

8. The new proposed monthly mortgage payment will be \$1,028.77 for 480 months which includes monthly principal, interest and any change due to variations in escrow amounts.
9. The prior interest rate was 4.125%.
10. The new interest rate will be 3.875% for 480 months.
11. Debtor requests that this Honorable Court grants authority to modify his current mortgage loan.

WHEREFORE, Debtor respectfully prays that this Court enter an order granting authority for Debtor to modify his mortgage through Specialized Loan Servicing LLC.

/s/ David H. Cutler
David H. Cutler, ESQ
Attorney for Debtor(s)
Cutler & Associates Ltd.
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